



May 19, 2006

Municipal Stormwater Phase II Western Washington Comment
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98501-7696

Department of Ecology
Water Quality Program
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FAX TRANSMITTAL

Re: Draft Municipal Stormwater Phase II Western Washington

To Whom It May Concern,

Under the Department of Ecology's draft Western Washington Phase II Municipal Stormwater Permit, public ports are identified as potentially requiring coverage as a Secondary Permittee. As a port district, the Port of Bellingham is concerned about the financial and staff resources that may be needed to administer the permit requirements. For environmentally conscious ports, the increased administrative effort results in little real benefits; the gains do not exceed the effort.

The Port of Bellingham is highly concerned about environmental conditions. The concern can be highlighted by the installation stormwater systems, catch basins, and filtration systems using current technology as a normal construction practice. The Port stresses Best Management Practices with boaters, tenants, and other users of port facilities through news letters, bulletin boards, and the port website. Additionally, the Port has participated in a pilot project using vegetative stormwater filtration systems to improve marine water quality by reducing bird fecal coliform loading. The Port also manages an Environmental Compliance Assessment Program (ECAP) that focuses on the environmental practices of businesses leasing and operating on port property.

With the environmental programs currently being managed including three industrial permits, the added layer of administrative documentation and reporting will create a greater burden than the benefits they will yield. The Port recommends that the Department of Ecology consider adding flexibility into the program that reduces the level of administrative efforts for environmental conscious port districts.

Sincerely,

Alan Birdsall
Manager of Strategic Project Development